

UNITED STATES DISTRICT COURT

for the

Northern District of California

IN RE TESLA, INC. SECURITIES LITIGATION

)

)

)

) Civil Action No. 3:18-cv-04865-EMC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

J.P. MORGAN SECURITIES LLC
c/o C T CORPORATION SYSTEM*(Name of person to whom this subpoena is directed)*

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

SEE ADDENDUM

Place:	Levi & Korsinsky, LLP 55 Broadway, 10 th Floor New York, NY 10006	Date and Time:	October 13, 2020 at 10:00 a.m.
--------	--	----------------	--------------------------------

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: September 29,
2020

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

s/ Adam M. Apton

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Lead Plaintiff

Glen Littleton, who issues or requests this subpoena, are:
Adam M. Apton, Esq., Levi & Korsinsky, LLP, 55 Broadway, 10th Floor, New York, NY 10006, Tel: (212) 363-7500,
E-mail: aapton@zlk.com.

10. As used herein, the terms “related to,” “relating to,” “in relation to,” “regarding,” and “concerning” means in relation to, related to, consisting of, referring to, reflecting, concerning, discussing, evidencing, commenting on, describing, constituting, supporting, contradicting, or having any logical or factual connection with the matter identified, in whole or in part.

III. DEMANDS FOR PRODUCTION

Demand for Production 1:

All Documents, Communications, and Electronic Data between July 1, 2018 through October 31, 2018 concerning Tesla, Musk, and/or Space Exploration Technologies Corp., t/a SpaceX.

Demand for Production 2:

All reports and notes drafted by you between July 1, 2018 through October 31, 2018 concerning Tesla, Musk, and/or Space Exploration Technologies Corp., t/a SpaceX.

Demand for Production 3:

All Documents, Communications, and Electronic Data concerning the United States Securities and Exchange Commission’s (“SEC”) probe, inquiry, or investigation concerning any or all of Musk’s and Tesla’s public statements from August 7, 2018 to August 24, 2018 regarding a potential going-private transaction for Tesla including, but not limited to, all Documents produced by you to the SEC, all transcripts, and all Communications with the SEC.

Demand for Production 4:

All Documents, Communications, and Electronic Data between July 31, 2017 through October 31, 2018 concerning the Tesla Model 3 and/or short interest in Tesla.